

ELLEN F. ROSENBLUM
Attorney General
TRACY ICKES WHITE #904127
Senior Assistant Attorney General
Department of Justice
1162 Court Street NE
Salem, OR 97301-4096
Telephone: (503) 947-4700
Fax: (503) 947-4791
Email: Tracy.I.White@doj.state.or.us

Attorneys for Defendants Department of Human Services and Carolina Caballero

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

RACHEL SAWYER and DUSTIN ARNOLD,

Plaintiffs,

v.

LEGACY EMANUEL HOSPITAL &
HEALTH CENTER, OREGON
DEPARTMENT OF HUMAN SERVICES
CHILD WELFARE, JAMES COUGHLIN,
M.D., SUNSHINE CRONE, CAROLINA
CABARELLO,

Defendants.

Case No. 3:18-cv-02128-SB

MOTION FOR EXTENSION OF TIME

UNOPPOSED

CERTIFICATE OF CONFERRAL

Counsel for defendants Oregon Department of Human Services and Carolina Cabarello
("State Defendants") has conferred with plaintiffs' counsel. He has no objection to this motion.

MOTION

The State Defendants move for an extension of time to file their response to plaintiffs' complaint, through and including January 14, 2019. Currently, under Fed. R. Civ. P. 81(c)(2), the response is due by December 19, 2018 (seven days after the Notice of Removal was filed). However, the State Defendants' counsel has not yet had an opportunity to meet with the client representatives to evaluate the complaint. The requested extension will allow counsel time to fully evaluate and prepare an appropriate response.

This motion is presented in good faith and not for the purposes of delay.

DATED December 12, 2018.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ Tracy Ickes White
TRACY ICKES WHITE #904127
Senior Assistant Attorney General
Trial Attorney
Tel (503) 947-4700
Fax (503) 947-4791
Tracy.I.White@doj.state.or.us
Of Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on December 12, 2018, I served the foregoing MOTION FOR
EXTENSION OF TIME upon the parties hereto by the method indicated below, and addressed to
the following:

Robert M. Snee
Robert M. Snee P.C.
PO Box 16866
Portland, OR 97292
of Attorneys for Plaintiff

☐ HAND DELIVERY
☒ MAIL DELIVERY
☐ OVERNIGHT MAIL
☐ SERVED BY E-FILING

s/ Tracy Ickes White
TRACY ICKES WHITE #904127
Senior Assistant Attorney General
Trial Attorney
Tel (503) 947-4700
Fax (503) 947-4791
Tracy.I.White@doj.state.or.us
Of Attorneys for Defendant